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**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

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RYAN FLYNN  
Cabinet Secretary

BUTCH TONGATE  
Deputy Secretary

**Certified Mail - Return Receipt Requested**

June 11, 2015

Ms. Donica Sharpe  
Acting City Manager  
City of Bloomfield  
915 N. First Street  
P.O. Box 1839  
Bloomfield, NM 87413

Re: Major Municipal; SIC 4952; Compliance Evaluation Inspection; Bloomfield Wastewater Treatment Plant; NPDES Permit No. NM0020770; May 12, 2015.

Dear Ms. Sharpe:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Racquel Douglas  
US Environmental Protection Agency, Region VI  
Enforcement Branch (6EN-WM)  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Bruce Yurdin  
New Mexico Environment Department  
Surface Water Quality Bureau  
Point Source Regulation Section  
P.O. Box 5469  
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Barbara Cooney at (505) 827-0212 or at [barbara.cooney@state.nm.us](mailto:barbara.cooney@state.nm.us).

Sincerely,  
*/S/ Bruce J. Yurdin*

Bruce J. Yurdin  
Program Manager  
Point Source Regulation Section  
Surface Water Quality Bureau

cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail  
Raquel Douglas, USEPA (6EN-WM) by e-mail  
Gladys Gooden-Jackson, USEPA (6EN) by e-mail  
Tung Nguyen, USEPA (6WQ-PP)  
NMED District II, by e-mail



Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

## NPDES Compliance Inspection Report

### Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5 3 N M 0 0 2 0 7 7 0 11 12 1 5 0 5 1 2 17			18 C	19 S 20 1	
Remarks					
B L O O M F I E L D W W T P M A J O R M U N I C I P					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 1 69	70 2	71 N 72 N 73 74 75	M A J O R	80	

### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) City of Bloomfield WWTP – Location: 1176 Church Street- From Bernalillo take State Hwy 550 north to Bloomfield, at the intersection of SH 550 and SH 64 turn left (west) go to Church Street, Turn Left(south) travel approx. ½ mile to the WWTP. San Juan County, New Mexico	Entry Time /Date 10:00 Hours / May 12, 2015	Permit Effective Date November 1, 2014
	Exit Time/Date 17:30 Hours/ May 12, 2015	Permit Expiration Date October 31, 2019
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) David Sonnenberg –Operations Superintendent (505) 632-0776, (505) 632-8475 or (505) 820-7182 Adrian Garcia – Collections Superintendent (505) 320-2050	Other Facility Data SIC: 4952	
Name, Address of Responsible Official/Title/Phone and Fax Number Donica Sharpe – Acting City Manager, 505-632-6302 / Fax 505-632-6310 915 North First Street P.O. Box 1839 Bloomfield, NM 87413	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Latitude- North 36° 43' 42" Longitude- West 107° 57' 00"

### Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	U	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
U	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
M	Effluent/Receiving Waters	S	Laboratory	N	Storm Water	N	Other:

### Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See Further Explanations Section of the Report For Details.

Name(s) and Signature(s) of Inspector(s) /S/ Barbara Cooney	Agency/Office/Telephone/Fax NMED/SWQB 505-827-0212	Date 6/11/2015
Signature of Management QA Reviewer /S/ Shelly Lemon	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2795	Date 6/15/2015

Bloomfield WWTP		PERMIT NO. NM0020770
SECTION A - PERMIT VERIFICATION		
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS: <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>NO</u> )		
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
4. ALL DISCHARGES ARE PERMITTED		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
SECTION B - RECORDKEEPING AND REPORTING EVALUATION		
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. DETAILS: Failure to report sewer overflow <input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>Yes</u> )		
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
c) ANALYTICAL METHODS AND TECHNIQUES.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
e) DATES AND TIMES OF ANALYSES.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
SECTION C - OPERATIONS AND MAINTENANCE		
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. DETAILS: <input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>YES</u> )		
1. TREATMENT UNITS PROPERLY OPERATED.		<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA
2. TREATMENT UNITS PROPERLY MAINTAINED.		<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.		<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA

Bloomfield WWTP	PERMIT NO. NM0020770
<b>SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)</b>	
9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
<b>SECTION D - SELF-MONITORING</b>	
PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>NO</u> ). DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
b) PROPER PRESERVATION TECHNIQUES USED.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
<b>SECTION E - FLOW MEASUREMENT</b>	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>NO</u> ) DETAILS: Not evaluated.	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION _ ) RECORDS MAINTAINED OF CALIBRATION PROCEDURES. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
6. HEAD MEASURED AT PROPER LOCATION.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
<b>SECTION F – LABORATORY</b>	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>No</u> ) DETAILS: Possible disinfectant contamination of bacteria samples.	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA

Bloomfield WWTP						PERMIT NO. NM0020770	
SECTION F - LABORATORY (CONT'D)							
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA	
4. QUALITY CONTROL PROCEDURES ADEQUATE. Possible Contamination of Bacteria Samples with aerosol disinfectant.						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA	
5. DUPLICATE SAMPLES ARE ANALYZED. <u>10</u> % OF THE TIME.						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	
6. SPIKED SAMPLES ARE ANALYZED. <u>10</u> % OF THE TIME. Spike samples analyzed as part of the DMR QA study.						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	
7. COMMERCIAL LABORATORY USED.						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	
LAB NAME		Huthur & Associates		City of Farmington WWTP			
LAB ADDRESS		Denton, TX					
PARAMETERS PERFORMED		Whole Effluent Toxicity Test		E. coli Bacteria			
SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. <input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>YES</u> ).							
OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	None	Slight	Slight	None	None	Greenish Brown	None
RECEIVING WATER OBSERVATIONS <u>See Attached Further Explanations.</u>							
SECTION H - SLUDGE DISPOSAL							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. DETAILS:				<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>YES</u> ).			
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. Not enough capacity in drying beds to handle solids produced				<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA			
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503.				<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA			
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO:				(e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)			
SECTION I - SAMPLING INSPECTION PROCEDURES (FURTHER EXPLANATION ATTACHED <u>NO</u> ).							
1. SAMPLES OBTAINED THIS INSPECTION.						<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA	
2. TYPE OF SAMPLE OBTAINED							
GRAB _____		COMPOSITE SAMPLE ____		METHOD _____		FREQUENCY	
3. SAMPLES PRESERVED.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
4. FLOW PROPORTIONED SAMPLES OBTAINED.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
7. SAMPLE SPLIT WITH PERMITTEE.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	

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### **Introduction**

A Compliance Evaluation Inspection (CEI) was conducted at the City of Bloomfield Wastewater Treatment Plant (WWTP) by Ms. Barbara Cooney of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) on 12 May 2015. The inspection was conducted by NMED for the U. S. Environmental Protection Agency (USEPA), Region 6, under the National Pollutant Discharge Elimination System (NPDES) permit program, in accordance with the Federal Clean Water Act. These inspections are conducted under agreement with USEPA and are used by the USEPA to determine compliance with the NPDES permit program.

This facility is a major municipal waste water treatment plant (WWTP) under the Federal Clean Water Act (CWA), section 402 National Pollutant Discharge Elimination system (NPDES) permit program and is assigned NPDES permit number NM0020770. The Standard Industrial Classification Code (SIC) is 4952. The facility discharges into the San Juan River in water quality segment 20.6.4.408 of the San Juan Basin (*State of New Mexico Standards for Interstate and Intrastate Surface Waters*). The designated uses for the segment are public water supply, industrial water supply, irrigation, livestock watering, wildlife habitat, primary contact, marginal coldwater aquatic life and warmwater aquatic life.

### **Inspection Details**

The inspector arrived at the Bloomfield WWTP at 10:00 hours. The inspector met with Mr. David Sonnenberg, Operations Superintendent and Mr. Alan Watts, Laboratory Analyst. The Inspector made introductions, showed her credentials and explained the purpose of her visit. Mr. Adrian Garcia, Supervisor of Collection System was also contacted. The inspector and Mr. Garcia went to two locations where recent sewer overflows had occurred. Mr. Sonnenberg then accompanied Ms. Cooney as she toured the WWTP and the laboratory. Ms. Cooney was provided at her request all records of plant and laboratory activity for the first quarter 2015 for a records review. An exit interview was held with Mr. Sonnenberg and Ms. Donica Sharpe Acting City Manager, Mr. Scott Eckstein Mayor, Mr. Garcia at City Hall following the inspection. The inspector left the city facilities at 17:30 hours.

### **Treatment Scheme**

The Bloomfield WWTP is designed to treat 0.9 MGD. The collection system is estimated to be 148 miles long and services a population of approximately 7800 people. The head works of the WWTP were upgraded in 2005. Influent flow is measured with Parshall flume with a staff gauge and an ultrasonic flow meter that totalizes the flow. The head works has split channels, one is to a manual bar screen, the other to the mechanical grit and solids removal system including a screw pump. The channels converge at an aerated grit chamber. The manual bar screen channel is a back up and was not being used at the time of the inspection. From the aerated grit chamber three sump pumps lift the influent water to the aeration basins. The sump pumps are run on rotation. One pump is rested at a time.

The two aeration basins are run in parallel. The square basins are above ground because of the high water table. Aeration is accomplished with surface aerators that sit approximately four feet deep in the basins. They create a great deal of turbulence at the surface of the basins. Due to the

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surface location of the aerators and the square shape of the basins, aeration is not efficient and evenly distributed throughout the basins. It is likely that solids accumulate and become septic in the bottom corners of the basins. From the aeration basins, decant is sent to the two secondary round clarifiers (run in parallel), then to the square serpentine chlorine contact chamber. Dechlorination follows that process and the effluent flows through a Parshall flume with a fixed staff gauge, and an ultrasonic flow meter reads the discharge volume. This is the sampling location for the NPDES permit. The flow then goes to the San Juan River through an enclosed pipe that is approximately 1/8 mile in length.

### **Sludge**

According to the operator, solids are wasted from the secondary clarifiers to an open air chamber identified as the aerobic digester / solids thickener. Decant from the digester / solids thickener is sent back to the head works where it mixes with the raw influent. From the digester / solids thickener, solids are sent to the belt press, then to the sludge drying beds. Final disposal of solids is to a surface disposal site at the Bondad landfill in Colorado. The sludge drying beds have under drains that direct liquids back to the head of the plant.

Grit removed from the head works is collected in a wheel barrow or hopper and after passing the paint filter test disposed of at the landfill.

### **FURTHER EXPLANATIONS**

Note: The sections are arranged according to the format of the enclosed EPA Inspection Checklist (Form 3560-3), rather than being ranked in order of importance.

#### **Section A – Permit Verification – Overall Rating of “Satisfactory”**

#### **Section B – Record Keeping and Reporting – Overall Rating of “Marginal”**

### **Permit Requirements For Record Keeping and Reporting**

The permit requires in Part III.3. D. Reporting Requirements

#### ***7. TWENTY-FOUR HOUR REPORTING***

*a. The permittee shall report any noncompliance which may endanger health or the environment. Notification shall be made to the EPA at the following e-mail address: R6 NPDES Reporting@epa.gov, as soon as possible, but within 24 hours from the time the permittee becomes aware of the circumstance. Oral notification shall also be to the New Mexico Environment Department at (505) 827-0187 as soon as possible, but within 24 hours from the time the permittee becomes aware of the circumstance. A written submission shall be provided within 5 days of the time the permittee becomes aware of the circumstances. The report shall contain the following information:*

- (1) A description of the noncompliance and its cause;*
  - (2) The period of noncompliance including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue;*
- and,*



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*(3) Steps being taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge.*

**Findings For Record Keeping and Reporting:**

1. Laboratory and WWTP records for the first quarter 2015 were reviewed. No adverse findings were noted in those records.

2. The permittee failed to report a sewer overflow that occurred on April 15, 2015. A complaint call was received by NMED from residents whose properties were affected by the raw sewage backing up into the buildings and overflowing onto the ground at 1441 East Blanco Blvd.

The WWTP Supervisor was on leave at the time and no other staff members were aware that notice of the spill was required to be reported to EPA and NMED. Mr. Adrian Garcia was eventually contacted by NMED and provided follow up reports as instructed.

**Section C - Operation and Maintenance – Overall Rating of “Unsatisfactory”**

**Permit Requirements For Operation and Maintenance**

The permit requires in Part III.3. PROPER OPERATIONS AND MAINTENANCE:

*a. The permittee shall properly and maintain all facilities and systems of treatment and control (and appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit. Proper operations and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.*

**Findings For Operation and Maintenance:**

Numerous facility design problems were observed during this inspection. Most of these are repeat findings.

1. Sanitary Sewer Conditions – Two manholes and overflow locations were inspected, the high school stadium parking lot and 1441 East Blanco Boulevard. The collection system in these locations is only two to three feet deep and the service lines are undersized for the volume of wastewater now being carried through the system, especially in the event of any sort of blockage. According to city personnel, these lines are estimated to be more than 40 years old, some are made of clay piping. The city population and business have expanded and outgrown the existing collection system. The city does have a maintenance schedule and crews that regularly jet rod the lines.

2. Aeration Basins - The parallel aeration basins have surface aerators that mix approximately the top six feet of the chambers. The paddles cause a great deal of turbulence and frequent

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splash over. Regardless of the highly turbulent surface these aerators create, the lower 2/3 of each basin does not receive adequate and reliable aeration and mixing, causing anoxic and potentially even septic conditions. **(This is a repeat finding)**

3. Secondary Clarifiers -The surface skimmer is worn and is not aligned correctly. It is pushing floating solids over the weirs and to the chlorine contact chamber. **(This is a repeat finding)**

4. Concrete cracks - This WWTP was built in 1978. New head works were built and put on line approximately 6 years ago. Throughout the WWTP there are indications of failing concrete, including cracks throughout all the treatment units including the secondary clarifiers. Inside the basins the concrete is pitted and crumbling from the many years of exposure to the caustic wastewater. Structural rebar is visible through the deteriorating treatment units. Metal parts and water works are showing signs of rusting throughout. The facility has contracted with a concrete specialist to evaluate the condition. **(This is a repeat finding)**

5. Aging treatment units and obsolete treatment units - The motors for the aeration basin paddle aerators are heavily worn, rusting and leaking oil. **(This is a repeat finding)**

6. Effluent color was slightly green - The effluent color was indicative of ineffective treatment throughout the WWTP. The color of the effluent was similar to what is commonly found in trickling filter processes. Activated sludge sewage treatment should be able to produce a much more clear effluent than was observed at this facility. **(This is a repeat finding)**

7. Chlorine Contact Chamber - Floating solids were observed in the chamber. Operators have installed a surface baffle to catch floating solids on the surface before they reach the effluent discharge point. In addition, since the last inspection, screens have been installed to catch all floating solids before leaving the treatment unit. This has improved effluent quality and has reduced the amount of visible floating solids being discharged.

8. The dechlorination solution, liquid sodium bisulfite is stored in the enclosed shed where the effluent sampling Parshall flume is located. Strong odors of the solution and extensive corrosion of all the metal piping including deterioration of the shed door suggest this storage does not provide adequate containment to protect workers and environment. This is potentially a hazardous situation for workers and this report is being sent to OSHA in New Mexico for review.

**Section D – Self Monitoring – Overall Rating of “Satisfactory”**

**Section E – Flow Measurements – Overall Rating of “Satisfactory”**

**Section F - Laboratory - Overall Rating of "Satisfactory"**

**Section G - Effluent and Receiving Water - Overall Rating "Marginal"**

City of Bloomfield WWTP  
NPDES Permit Number NM0020770  
Compliance Evaluation Inspection  
May 12, 2015  
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**Permit Requirements For Effluent and Receiving Water**

The permit requires in Part I. Section A. Limitations and Monitoring Requirements:

*1. OUTFALL 001 - FINAL Effluent Limits - 0.9 MGD Design Flow*

*During the period beginning the effective date of the permit and lasting through the expiration date of the permit (unless otherwise noted), the permittee is authorized to discharge treated domestic wastewater from Outfall 001 to San Juan River. Such discharges shall be limited and monitored by the permittee and reported as specified below:*

Effluent Characteristics	Lbs/day, unless noted				Mg/L, unless noted			Monitoring Requirements	
Pollutants	30 Day Avg	Daily Max	7Day Avg		30 Day Avg	Daily Max	7 Day Avg	Measuring Frequency	Sample Type
pH						Minimum 6.6 su	Maximum 9.0 su	5/Week	Grab
Flow		Report MGD	Report MGD		Report MGD	NA	NA	Continuous	Totalizing Meter
BOD 5-day	225	NA	338		30	NA	45	Two/Week	24 Hour Composite
TSS	225	NA	338		30	NA	45		24 Hour Composite
E. coli Bacteria	NA	4.30 x 10 <sup>9</sup> (*3)	NA		126 cfu	126 cfu	NA	Five/Week	Grab
Total Residual Chlorine	NA	NA	NA		NA	19 µg/l	NA	Daily	Grab
Total Dissolved Solids Net Increase	22264	NA	NA		400	NA	NA	1/Quarter	3 Hour Composite

\*3 Conversion factor to determine loading limit is 3.79 x 10<sup>7</sup> x Flow in MGD x cfu/100 ml in effluent.

**Findings For Effluent and Receiving Water:**

Discharge is only allowed from Outfall 001 at the final effluent for the WWTP as stated above. Sewer overflows are unpermitted discharges. Two known sewer overflows occurred within the last year.

The April 15, 2015 Sewer Overflow at 1441 East Blanco Blvd., an estimated 750 gallons was reported. Sewage flowed through at least one business and one resident's property.

April 21, 2015 Sewer Overflow at the high school stadium parking lot, an estimated 300 gallons was reported. Some raw sewage did likely enter a storm drain that flows to the San Juan River though the exact volume is unknown.

No effluent exceedences were reported on the DMRs from Outfall 001.

**Section H - Sludge Disposal - Overall Rating of "Satisfactory"**

**MED/SWQB  
Official Photograph Log  
Photo # 1 & 2**

Photographer: B. Cooney

Date: May 12, 2015

Time: 12:11 Hours

City/County: Bloomfield / San Juan County

State: New Mexico

Location: Bloomfield Wastewater Treatment Plant Collection System

Subject: Location of April 15 sewer overflow, 1441 E. Blanco Blvd. and a property that was affected. The property is subgrade from the sewer line. The area was clean and free of the debris at the time of the in section. The building is under construction for repairs from sewage damage.



**NMED/SWQB  
Official Photograph Log  
Photo # 3**

Photographer: B. Cooney

Date: May 12, 2015

Time: 11:27 Hours

City/County: Bloomfield / San Juan County

State: New Mexico

Location: Bloomfield Wastewater Treatment Plant

Subject: Manhole at the high school stadium parking lot. The flow level is less than 2 feet below the surface and the sewer line is at capacity. No additional flow in this part of the collection system can be reliably transported to the WWTP. Sewer rehabilitation and expansion studies are advised.



**NMED/SWQB  
Official Photograph Log  
Photo # 4**

Photographer: B. Cooney

Date: May 12, 2015

Time: 13:20 Hours

City/County: Bloomfield / San Juan County

State: New Mexico

Location: Bloomfield Wastewater Treatment Plant

Subject: Effluent Parshall Flume – the effluent was free of floating solids – an improvement from the previous inspection.



**NMED/SWQB  
Official Photograph Log  
Photo # 4**

Photographer: B. Cooney

Date: May 12, 2015

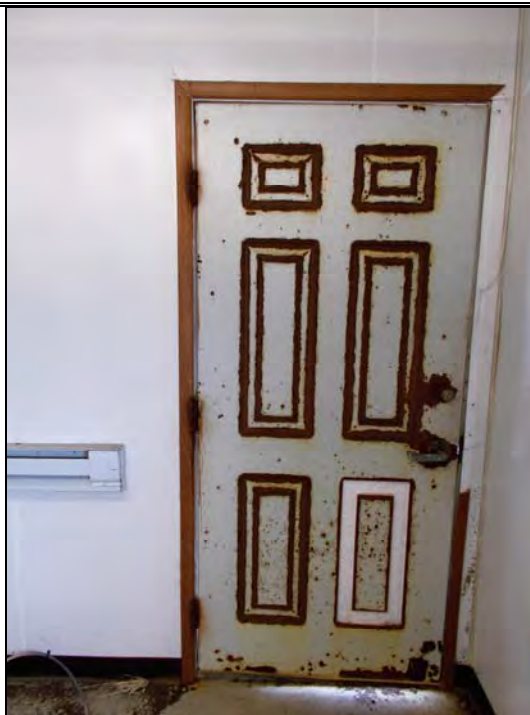
Time: 13:23 Hours

City/County: Bloomfield / San Juan County

State: New Mexico

Location: Bloomfield Wastewater Treatment Plant

Subject: The metal door in the building that houses the effluent Parshall flume and the dechlorination storage solution sodium bisulfite is showing signs of corrosion from the vapors.





**NMED/SWQB  
Official Photograph Log  
Photo #5**

Photographer: B. Cooney

Date: May 12, 2015

Time: 13:25 Hours

City/County: Bloomfield / San Juan County

State: New Mexico

Location: Bloomfield Wastewater Treatment Plant

Subject: Extensive solids entering the chlorine contact chamber.



**NMED/SWQB  
Official Photograph Log  
Photo # 6**

Photographer: B. Cooney

Date: May 12, 2015

Time: 13:24 Hours

City/County: Bloomfield / San Juan County

State: New Mexico

Location: Bloomfield Wastewater Treatment Plant

Subject: Newly installed screens are collecting the floating solid before they exit the chlorine contact chamber. This screening is improving the effluent quality.

